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Attorneys for Plaintiff
 IRMA RAMIREZ

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IRMA RAMIREZ,)	CASE NO. 15-cv-01547-EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER FOR PLAINTIFF TO AMEND
v.)	COMPLAINT
)	
)	
YUCATASIA; WAI HO and CHUN MUI)	
HO, Trustees of the WAI HO and CHUN)	
MUI HO 2001 Revocable Trust;)	
LORRAINE T.C. DUN, as Trustee of the)	
LORRAINE T.C. DUN SURVIVOR'S)	
TRUST; LORRAINE T.C. DUN, as Trustee)	
of the EDMUND Y.K. DUN BYPASS)	
TRUST; and DUONG PHUONG, an)	
individual dba YUCATASIA,)	
)	
Defendants.)	
)	

IT IS STIPULATED, by and through the parties respective attorney of record that plaintiff IRMA RAMIREZ be permitted leave to file the proposed First Amended Complaint (attached hereto as Exhibit "A"), and the answer previously filed by defendant DUONG PHUONG, an individual dba YUCATASIA shall serve as his answer to the First Amended Complaint.

1 This stipulation may be executed in counterparts and have the same force and effect as
2 though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall
3 have the same force and effect as originals.

4
5 Respectfully Submitted,

6 Dated: August 11, 2015

7 THOMAS E. FRANKOVICH,
8 *A PROFESSIONAL LAW CORPORATION*

9 By: /s/Thomas E. Frankovich
10 Thomas E. Frankovich
11 Attorney for Plaintiff IRMA RAMIREZ

12 Dated: August 21, 2015

13 JOSEPH A. LEPERA,
14 LEPERA & ASSOCIATES, PC

15 By: /s/Joseph A. Lepera
16 Joseph A. Lepera
17 Attorney for Defendant DUONG PHUONG, an
18 individual dba YUCATASIA

19 **ORDER**

20 Pursuant to the parties' stipulation, **IT IS ORDERED** that plaintiff IRMA RAMIREZ
21 has leave of this Court to file the First Amended Complaint attached hereto as Exhibit "A," and
22 the answer previously filed by defendant DUONG PHUONG, an individual dba YUCATASIA
23 shall be deemed an answer for defendant DUONG PHUONG, an individual dba YUCATASIA
24 to the First Amended Complaint.

25 Dated: 8/26, 2015

26 Honorable J.
27 United States

